

by November 3, 2005, the undersigned again contacted the Examiner and requested that an interview be granted. By reply voicemail, the Examiner advised that an interview would not be granted because the issues raised in the Interview Request Form were previously addressed in the Examiner's final Official Action. Applicant respectfully disagrees and requests reconsideration of the outstanding rejections. Indeed, it is respectfully submitted that, for the reasons set forth in greater detail below, the claims presented are not anticipated by the cited art nor obvious from its teachings.

Claims 1-4, 7-8 and 11-12 were rejected under 35 USC 102(b) as being anticipated by Igarashi. Applicant respectfully traverses this rejection.

Claim 1 literally requires *inter alia* 1) that each stator coil include a bobbin fitted to one of the teeth and a phase coil wound around the bobbin, 2) that each bobbin include a bobbin terminal for connecting opposite ends of the phase coil, and 3) that the bobbin terminal have a second contact portion in contact with the first contact portion of the stator terminal.

Anticipation under Section 102 of the Patent Act requires that a prior art reference disclose every claim element of the claimed invention. See, e.g., Orthokinetics, Inc. v. Safety Travel Chairs, Inc., 806 F.2d 1565, 1574 (Fed. Cir. 1986). While other references may be used to interpret an allegedly anticipating reference, anticipation must be found in a single reference. See, e.g., Studiengesellschaft Kohle, G.m.b.H. v. Dart Indus., Inc., 726 F.2d 724, 726-27 (Fed. Cir. 1984). The absence of any element of the claim from the cited reference negates anticipation. See, e.g., Structural Rubber Prods. Co. v. Park Rubber Co., 749 F.2d 707, 715 (Fed. Cir. 1984). Anticipation is not shown even if the differences between the claims and the prior art reference are insubstantial and the missing elements could be supplied by the knowledge of one skilled in the art. See, e.g., Structural Rubber Prods., 749 F.2d at 716-17.

As is well understood in the art, a "bobbin" is not merely an insulator layer, but is understood to be a reel on which wire is wound. (Merriam-Webster Online Dictionary). If a bobbin were indeed provided in Igarashi around which a coil 15 were wound and fitted to a tooth of the stator, then that bobbin must appear in Figure 2 of Igarashi, in an analogous manner to the way in which the bobbin 61 (flange portion) is shown in Figure 1 of the present application. No such bobbin structure, however, is depicted in Figure 2 of Igarashi. Although the Examiner has referred to the cross-hatched portion located between core 13 and winding 15 as allegedly constituting a bobbin, it is respectfully submitted that a person having ordinary skill in this art would recognize and understand that the cross-hatched portion that the Examiner has identified is at most an insulator layer that is disposed to cover the tooth before the coil is wound. Such an insulator layer is not disclosed as nor would it be understood to be a bobbin about which a coil may be wound and which may thereafter be slid onto the stator core's tooth. Thus, at most, Igarashi shows an insulator layer interposed between a coil and a tooth but there is no teaching in Igarashi of a bobbin, as that term is understood in the art, around which a coil is wound and which is fitted to the tooth of the stator.

Even if the unlabeled cross-hatching of Igarashi is considered to read on a "bobbin", it is respectfully submitted that Igarashi does not anticipate nor suggest the claimed "bobbin terminal for connecting opposite ends of the phase coil". The Examiner has asserted that elements 15a and 15b of Igarashi "extend from the coil/bobbin assembly" and that "bobbin terminal is broad enough to read on bobbin leads 15a and 15b". Applicant respectfully challenges the Examiner's interpretation of claim 1 and characterization of Igarashi. Claim 1 does not refer to "bobbin leads" extending from a "coil/bobbin assembly". Rather, claim 1 specifically provides that each bobbin includes a bobbin terminal for connecting opposite ends of the phase coil. Even if the unlabeled cross-hatch between core 13 and winding 15 is considered to be a bobbin, there is absolutely no disclosure whatsoever of that "bobbin" including bobbin terminal(s) connected to end(s) of the phase coil. Igarashi discloses opposite ends 15a

and 15b of coil winding 15 but does not show or in any way teach or suggest that the bobbin/insulator includes any terminal component to connect to end 15a and/or 15b. Indeed, "bobbin terminal" as recited in claim 1 is not broad enough to properly be read on the ends of the coil winding themselves, as the Examiner has suggested. Claim 1 is not subject to broad interpretation in this regard because its plain language requires that the bobbin terminal be included with the bobbin (assembly) and connected to the phase coil end, is thus different from the opposite end(s) of the phase coil themselves.

In view of the foregoing, it is respectfully submitted that Igarashi does not disclose a bobbin and even if the unlabeled cross-hatch insulation is considered to be a bobbin, Igarashi does not disclose that "said bobbin includes a bobbin terminal for connecting opposite ends of the phase coil".

Claim 11 similarly requires that each bobbin include "a pair of bobbin terminals to which opposite ends of one of said phase coils are connected". Moreover, claim 12 specifically requires that each bobbin have a pair of bobbin terminals and specifically recites the step of connecting opposite ends of each phase coil to the bobbin terminals, which is also not taught or suggested by Igarashi.

Not only does Igarashi fail to disclose bobbin terminal(s) as claimed, there is no teaching of such bobbin terminal having a second contact portion, as also required by claims 1, 11 and 12. In this respect, Igarashi includes a first contact portion at reference numeral 32 representing one of a plurality of recesses formed at the outer periphery 28 of a connecting unit 16 (stator terminal). Recess 32 engages one of the projections 34 of a plurality of conducting members (bus bars) 18-20 for three-phase connection. The projection 34 does not, however, correspond to the second contact portion of the bobbin terminal defined in applicant's claim 1. The conducting members 18-20 include receptacles 37 for receiving respective ends 15a of the phase coil directly. Thus, Igarashi does not disclose or in any way suggest a bobbin including a bobbin terminal for connecting to an end of the phase coil and having a second contact portion

in contact with a first contact portion of a stator terminal. It is therefore respectfully submitted that even if Igarashi could be construed as including a bobbin, a bobbin terminal attached to an end of the phase coil and in contact with a stator terminal, as claimed in claims 1, 11 and/or 12, would still not be anticipated nor obvious. It is therefore respectfully submitted that the claims presented are not anticipated by nor obvious from Igarashi.

For all the reasons advanced above, reconsideration and withdrawal of the rejection based on Igarashi and allowance of claims 1-4, 7-8 and 11-12 is solicited.

Claims 5, 6 and 10 were rejected under 35 USC 103(a) as being unpatentable over Igarashi in view of Batten. Applicant respectfully traverses this rejection.

Claims 5, 6 and 10 are submitted to be patentable over Igarashi for the reasons advanced above. The Examiner's further reliance on Batten does not overcome the deficiencies of the primary reference noted above. Indeed, Batten et al do not teach or in any way suggest the provision of a bobbin having a bobbin terminal as specifically recited in claim 1.

Claims 13-15 were rejected under 35 USC 103 as unpatentable over Igarashi in view of Katayama. Applicant respectfully traverses this rejection.

Claims 13-15 are submitted to be patentable over Igarashi for the reasons advanced above. The Examiner's further reliance on Katayama does not overcome the deficiencies of the Igarashi noted above. In this regard, Igarashi allegedly teaches an insulation layer between the coil and the stator tooth, but does not teach or in any way suggest a bobbin. Even if the insulation layer is considered "a bobbin", it does not include any bobbin terminal nor any second contact surface for engaging a first contact surface of a stator terminal as recited in, e.g., claims 1, 11 and 12.

Katayama discloses a coil terminal attached to a bobbin and extending to an external connection terminal 13. From this disclosure, the Examiner summarily

concludes that the subject matter of applicant's claims 13-15 would have been obvious. It is respectfully submitted, however, that contrary to the Examiner's statement, it would not have been obvious to "replace lead terminals 15a and 15b" of Igarashi with the bobbin and terminal structure of Katayama. As noted above, elements 15a and 15b of Igarashi are simply the opposite ends of the phase coil so, quite clearly, they could not be "replaced". Furthermore, it is respectfully submitted that Katayama does not in any event disclose the subject matter claimed because the claimed first and second contact portions are not provided by Katayama. By the Examiner's own admission, Katayama discloses only terminal pins or wires 12 and there are no details of how they are connected to the external connection terminal; certainly no disclosure of first and second contact surfaces as applicant has claimed, between bobbin terminals and a plurality of stator terminals embedded in an insert mold and each having a first contact portion. It is therefore respectfully submitted that the Examiner's suggested modification of Igarashi in view of Katayama is not a modification that one skilled in the art would obviously undertake without the benefit of applicant's disclosure. Moreover, even if an effort were made to modify Igarashi in view of Katayama, it is respectfully submitted that the combination specifically claimed by applicant would still not be anticipated nor obvious.

Reconsideration and withdrawal of the rejection of claims 13-15 is therefore solicited.

All objections and rejections having been addressed, it is respectfully submitted that the present application is in condition for allowance and an early Notice to that effect is earnestly solicited.

KIMURA et al.
Appl. No. 10/615,784
November 17, 2005

Respectfully submitted,

NIXON & VANDERHYE P.C.

By:



Michelle N. Lester
Reg. No. 32,331

MNL:slj
901 North Glebe Road, 11th Floor
Arlington, VA 22203-1808
Telephone: (703) 816-4000
Facsimile: (703) 816-4100